



**Andrew R. Spector, Partner**  
Admitted in Florida, New York and Texas

Direct phone: 305.537.2002  
Direct fax: 305.537.2001  
andrew.spector@spectorrubin.com

June 9, 2020

**MEMORANDUM ENDORSEMENT**

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square, Courtroom 1305  
New York, New York 10007

**Re: Joint Motion for Consolidation of Settlement Conferences**  
**Lead Case Caption: Sai Marine Export Pvt Limited v. Maersk Line A/S**  
**Lead Case No.: 1:19-cv-11364-PAE**  
**Member Case: Liberty Specialty Markets Limited et al v. Maersk, Inc. et al.**  
**Member Case No. 1:19-cv-11373-PAE**

Dear Judge Engelmayer,

We represent Plaintiff, Liberty Specialty Markets Limited a/s/o Express, Inc. and Express, LLC (hereinafter "Plaintiff"), in the above-referenced case. Pursuant to Your Honor's Individual Practices ¶ 1(a) and Order Referring Case to Magistrate Judge for Settlement Conference [D.E. 26], this letter-motion is submitted jointly along with counsel for Co-Plaintiff, Sai Marine Export Pvt Limited, and Defendants, Maersk, Inc., Maersk Line A/S, Maersk Line, Limited, and Maersk Line India Pvt Ltd, who consent to the relief requested herein.

Counsel for all Parties in the Member Case and the Lead Case respectfully request that the Settlement Conferences be consolidated. On May 20, 2020, the Court consolidated the Member Case with the Lead Case (1:19-cv-11364-PAE). (See Lead Case [D.E. 18]). Thereafter, on June 3, 2020, counsel for all Parties in the Member Case and the Lead Case appeared telephonically before Your Honor for the Initial Pretrial Conference. On June 4, 2020, the Court entered the Civil Case Management Plan and Scheduling Order. (See Lead Case [D.E. 22]). Pursuant thereto, the Parties agreed to conduct a settlement conference before a Magistrate Judge. Accordingly, on June 4, 2020, the Court further entered an Order Referring Case to Magistrate Judge. (See Member Case [D.E. 26] and Lead Case [D.E. 23]). However, at this time, the cases have been referred to different Magistrate Judges for settlement purposes. Accordingly, the Parties respectfully request that the settlement conferences be consolidated as the Member Case and Lead Case were previously consolidated.

Based on the foregoing, counsel for Plaintiffs and Defendants in the Member Case and the Lead Case respectfully submit that consolidation of the settlement conferences will serve the interests of judicial economy.

The Honorable Paul A. Engelmayer  
United States District Judge  
June 9, 2020  
Page 2

Should Your Honor have any questions regarding the foregoing, please do not hesitate to contact our office. Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Andrew Spector*

Andrew R. Spector

cc: All Counsel of Record (via *ECF*)

The Order scheduling a settlement conference in 19 Civ. 11364 (Docket # 24) shall be deemed to also apply to the case of Liberty Specialty Markets Limited et al v. Maersk, Inc. et al., 19 Civ. 11373. All parties to both cases should read this Order carefully and comply with its requirements. The telephone conference before Judge Parker scheduled in Docket # 27 in 19 Civ. 11373 is cancelled.

So ordered.

Dated: June 10, 2020

  
\_\_\_\_\_  
GABRIEL W. CORENSTEIN  
United States Magistrate Judge